



2019-LTR-1038
December 20, 2019

Mr. John Temple
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

Dear Mr. Temple

Re: Perma-Fix Northwest Richland, Inc. (PFNW)
Mixed Waste Facility
Site Identification Number WAR 000010355
Contingency Plan Incident Report

In accordance with Section G.5.1 of the Perma-Fix Northwest Richland, Inc. (PFNW) Mixed Waste Facility (MWF) Resource Conservation and Recovery Act (RCRA)/Toxic Substances Control Act (TSCA) Contingency Plan, PFWN is submitting this incident report within 15 days of implementation of the Contingency Plan. On Monday, December 16th, PFWN operations personnel discovered and extinguished a small fire in a metal disposal box of low-level, non-hazardous depleted uranium (DU) waste that occurred at its Richland facility. The Emergency Coordinator evaluated the criteria in Section G.3 of the Contingency Plan located in Attachment GG of the Resource Conservation and Recovery Act (RCRA)/Toxic Substances Control Act (TSCA) Permit, and concluded that although the event did not require a time urgent response from the Fire Department, nor did it pose a threat to human health or the environment, it would be most conservative to implement the Contingency Plan. The Washington State Department of Ecology was notified of the incident at approximately 3:00 pm the same day.

At approximately 12:30am PST Monday, December 16th, Perma-Fix Northwest operations personnel, Mike McCargar (Operations Manager), discovered a small fire in room SB-07 at the Mixed Waste Facility. Mike McCargar notified Brad Mulliner (MWF Supervisor), Richard Grondin (Vice President/General Manager), and Curt Cannon (Radiation Safety Officer/ESH&Q Manager). Curt Cannon immediately assumed responsibility as the Emergency Coordinator.

The event was associated with a 117 cubic foot metal disposal box containing non-hazardous, low-level DU turnings. The fire was contained within the metal box, and PFWN operations personnel were able to extinguish the fire with fire extinguishers and bags of diatomaceous earth and sand.

PFNW is confident that there was not a release of radioactive or hazardous material as a result of this event, and officials from the Washington State Department of Health have initially agreed with this assertion. The fire did not involve a treatment unit or hazardous waste. The metal disposal box contained grout, wood and metal bracing, and approximately 50 cubic feet of non-hazardous, low-level DU turnings. Contamination readings in the room and adjacent rooms indicated there was no spread of contaminated material. Contamination surveys were also performed of the room in which the fire occurred and surrounding area during and after the event, and no spread of radiological material was identified. Additionally, air samples collected during the event and during clean up did not show any elevated radiological readings.

The fire was contained to within the metal disposal box, and no damage occurred to the facility, the floor, or other nearby waste/materials. The integrity of the metal box and the disposition of the low level waste inside are still being determined. The path forward has not yet been determined but could include removal, repackaging and grouting of the DU turnings, along with disposal of the metal box. The temperature is being monitored on the metal box until repackaging can occur to ensure it does not reignite.

PFNW has conducted a full review of what factors led to the fire and to ensure appropriate measures are in place to prevent a similar situation in the future. The investigation revealed that the cause of the fire was the use of wood inside the container to prevent the DU turnings from "floating" in the grout to within 2 inches of the side of the box. The wood may have acted as a bridge restricting the grout from flowing fully around the DU turnings, allowing air to ignite the turnings and catch the wood on fire. Immediate corrective actions were to halt the addition of wood when treating DU turnings.

The root cause was determined to be inadequate detail in the work authorization to specifically prevent the addition of wood into the disposal package when grouting DU turnings. Corrective actions will be to include specific language in the work authorization restricting the use of wood or any other combustible materials when packaging and grouting DU turnings.

If you have any questions regarding the information in this incident report, please feel free to contact me at (509) 375-7026.

Sincerely,



Richard Grondin
Perma-Fix Northwest Richland, Inc.
Vice-President and General Manager

cc electronic:
Dave Bartus, EPA
Kathy Conaway, WDOE
Jared Mathey, WDOE
Kristen Schwab, WDOH

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Certification Statement

The following certification statement fulfills the requirements of Hazardous Waste Management Act, in accordance with WAC 173-303-810(13)(a), and Toxic Substance Control Act, in accordance with 40 CFR 761.3, for Perma-Fix Northwest Richland, Inc. permit for the Storage and Treatment of Mixed Waste and for the Storage and Disposal of Mixed-Toxic Substance Control Act (TSCA) Regulated Polychlorinated Biphenyl (PCB) Wastes.

The certification below covers the documentation and submission of the Contingency Plan Incident Report submitted in letter No. 2019-LTR-1038, dated December 20, 2019.

As the Vice President/General Manager of the Mixed Waste Facility, I have the authority to certify on behalf of the corporation.

HWMA CERTIFICATION
[WAC 173-303-810(13)(a)]

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Perma-Fix Northwest Richland, Inc.



Richard Grondin, Vice President/General Manager



Date: December 20, 2019